

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

YVONNE THOMAS,]	
]	
Plaintiff,]	
]	
v.]	Case o: 4:03CV01114TCM
]	
ST. LOUIS BOARD OF]	
POLICE COMMISSIONERS,]	
]	
Defendants.]	

**DEFENDANTS' PROPOSED WITNESS
AND EXHIBIT LIST**

Defendants identify the following persons as witnesses who will or may be asked to testify during presentation of their case-in-chief. Those who will be called are indicated by an asterisk:

Off. Andre Smith*
Off. Jerry Lattimore*
Sgt. Fred Turner*
Lt. Stephen Cheli
Vincent Dunn*
Sylvia Jankowski
Yvonne Thomas*
Dr. Jyothi Mandava
Dr. Kulsoom Junaid
Dr. Mark McCain
Custodian of Records, Christian Hospital Northeast
Custodian of Records, Barnes Jewish Hospital
Custodian of Records, St. Louis Connect Care
Custodian of Records, St. Louis Heart and Vascular Center

In listing the following exhibits, defendants reserve the right to utilize additional exhibits not listed for impeachment purposes as circumstances warrant. Specifically, defendants expressly reserve the right to introduce plaintiff's medical records from Dr.

Mack McCain, St. Louis Connect Care, Christian Hospital Northeast, St. Louis Heart & Vascular Center, and any other physician or entity plaintiff alludes to in support of her claims of damage. Such records, if used at all, will be authenticated through the use of affidavits or a record custodian. With those caveats, the following exhibits will or are expected to be used during the testimony of one or more witnesses. Those exhibits that will be used are indicated with an asterisk:

Def. Ex. A	Special Order 90-S-13 (eff. 8/20/90)*
Def. Ex. B	St. Louis Metropolitan Psychiatric Center medical records for Yvonne Thomas*
Def. Ex. C	Photographs of Yvonne Thomas' home and yard*
Def. Ex. D	Affidavit by Off. Jerry Lattimore*
Def. Ex. E	Audio tape of complaint and dispatch directive Compiled from police records

Defendants' exhibits A and B constitute business records for either the St. Louis Police Dept. or the St. Louis Metropolitan Psychiatric Center. The facts establishing those records as business records will be authenticated via affidavit. Those affidavits have been provided to the Court's clerk and opposing counsel as required by the pretrial order.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON
Attorney General

/s/ Doug Leyshock

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ATTORNEYS FOR DEFENDANTS
SMITH AND LATTIMORE

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and that I have mailed by United States Postal Service the above document to all non CM/ECF participants:

Herman L. Jimmerson
225 S. Meramec, Suite 508
Clayton, Mo 63105

/s/ Doug Leyshock
Assistant Attorney General